

# Equitus Law Alliance, PLLC

P.O. Box 280240  
Nashville, TN 37228

July 28, 2011

Sue Bates, Claudia Birdyshaw, Willarene Fisher, Mark Long,  
Jon Toungett, Carolyn Wade, and  
Richard White  
Lawrenceburg TN

## Professional Services

	<u>Amount</u>
6/5/2007 Conference with [REDACTED] concerning drug free workplace and medical condition.	315.00
6/6/2007 Prepare letter and [REDACTED].	225.00
6/7/2007 Phone conference with C. Berdyshaw. Review memo with intern.	112.50
6/14/2007 Phone conference with [REDACTED].	90.00
Phone conference with [REDACTED]	75.00
Phone conference with [REDACTED].	30.00
6/11/2007 Phone conference with [REDACTED] concerning representation.	45.00
Work on letter and questionnaire.	157.50
6/12/2007 Work on questionnaire.	90.00
6/13/2007 Phone conference with [REDACTED], [REDACTED], Ms. Bates, Ms. Berdyshaw concerning drug testing.	315.00
6/21/2007 Prepare letter concerning EEOC.	45.00
6/28/2007 Phone conference with R. Whyte concerning claimant.	45.00
7/2/2007 Phone conference with S. Bates concerning unemployment benefits.	67.50
Work on letter and claim forms.	67.50

	<u>Amount</u>
7/5/2007 Prepare EEOC Claim Form.	112.50
7/13/2007 Letter concerning EEOC.	45.00
7/19/2007 Work on reponses for Claimants.	112.50
8/6/2007 Letter to client.	45.00
9/21/2007 Letter to EEOC concerning representation of clients.	19.00
9/7/2007 Phone conference with J. Toungett concerning case.	45.00
10/2/2007 Letter to R. Ferguson concerning EEOC Charge of Discrimination.	19.00
Letter to EEOC concerning W. Fisher Charge of Discrimination.	19.00
10/4/2007 Letter to EEOC concerning J. Toungett.	19.00
10/19/2007 Letter to EEOC concerning M. Long.	19.00
Letter to M. Long concerning EEOC.	19.00
Review mediation request.	67.50
10/15/2007 Begin drafting Complaint.	157.50
10/24/2007 Phone conference with C. Wade regarding EEOC's request for mediation.	19.00
Letter to EEOC concerning mediation with C. Wade.	19.00
Letter to C. Wade concerning EEOC mediation documents.	19.00
10/25/2007 Prepare statement of facts for R. White, J. Toungett, and M. Long.	171.00
10/23/2007 Complete rough draft of C. Berdyshaw Complaint.	112.50
10/26/2007 Prepare statement of facts for C. Wade and W. Fisher.	161.50
11/1/2007 Review and revise statements of facts and charges.	180.00
11/14/2007 Amend EEOC Charge of Discrimination for M. Long.	19.00
Letter to M. Long concerning amended Charge of Discrimination.	19.00
11/29/2007 Letter to S. Bates concerning EEOC Charge of Discrimination.	19.00
Prepare EEOC Charge of Discrimination form for S. Bates.	28.50
11/30/2007 Letter to M. Long concerning revised Amended Charge of Discrimination.	19.00

	<u>Amount</u>
12/3/2007 Revising Complaint.	50.00
12/4/2007 Researching causes of action.	187.50
Revising Complaint.	62.50
12/11/2007 Revising Complaint.	125.00
12/13/2007 Revising Complaint.	462.50
12/14/2007 Final revisions to Complaint.	87.50
1/22/2008 Letter to EEOC concerning Mark Long's amended Charge of Discrimination.	19.00
1/24/2008 Review and revise C. Berdyshaw Complaint.	225.00
2/1/2008 Phone conference with M. Birdyshaw concerning information for complaint.	19.00
2/14/2008 Phone conference with D. Walker with the EEOC concerning status of mediation.	19.00
Phone conference with C. Wade concerning status of mediation.	19.00
2/20/2008 Phone conference with K. Lee concerning status of C. Wade case.	19.00
Prepare Verified Complaint for C. Wade.	47.50
2/22/2008 Phone conference with R. White concerning status.	19.00
3/12/2008 Letter to A. Ray concerning representation.	19.00
4/1/2008 Prepare EEOC Charge form for A. Ray.	19.00
Letter to A. Ray concerning EEOC claim form and engagement letter.	19.00
4/29/2008 Call from EEOC.	25.00
Call from EEOC.	25.00
4/28/2008 Call to EEOC.	25.00
4/30/2008 Call from EEOC.	25.00
5/2/2008 Revising Complaint.	375.00
Correspondence to clients.	25.00
Draft causes of action for ADA violations.	125.00
5/1/2008 Drafting Complaint.	375.00

	<u>Amount</u>
5/5/2008 Call from S. Bates.	25.00
Call from R. White.	50.00
Call from M. Long.	37.50
Call from W. Fisher.	37.50
Revising Complaint.	62.50
5/7/2008 Call from J. Toungett.	37.50
Revising Complaint.	25.00
5/8/2008 Call from Carolyn Wade.	37.50
5/9/2008 Revising & filing Complaint.	62.50
5/2/2008 Review and revise Complaint.	225.00
5/29/2008 Call from Court Clerk.	25.00
Correspondence to Court Clerk.	25.00
Call from Court Clerk.	25.00
5/30/2008 Interview witness.	90.00
6/13/2008 Begin draft of Rule 26 Disclosure Statement and Proposed Initial Case Management Order.	114.00
6/16/2008 Filing return of Summons.	25.00
6/9/2008 Letter to CT Corporate Systems (Registered Agent).	25.00
6/20/2008 Call from Bob Boston.	25.00
Research bankruptcy case.	37.50
6/17/2008 Letter to EEOC concerning Freedom of Information request.	25.00
7/3/2008 Drafting proposed Case Management Order.	62.50
7/11/2008 Prepare for Case Management Conference.	180.00
7/23/2008 Revise Rule 26 disclosures.	62.50
Letter to Dura attorneys.	25.00
7/22/2008 Call to Richard White.	25.00

	<u>Amount</u>
7/11/2008 Case Management Conference.	100.00
7/10/2008 Call from R. White.	25.00
7/9/2008 Email to opposing counsel concerning CMD.	25.00
7/7/2008 Draft & revise Case Management Order. Email to opposing counsel.	125.00
7/17/2008 Letters to clients concerning Judicial Settlement Conference.	67.50
7/25/2008 Review EEOC docs.	150.00
7/24/2008 Letter concerning documents.	67.50
7/26/2008 Work on discovery.	225.00
8/1/2008 Revise discovery.	62.50
8/7/2008 Draft discovery.	125.00
8/8/2008 Draft Discovery.	412.50
Review and revise discovery to Dura.	225.00
Review and revise Case Management Order. Phone conference with B. Boston.	112.50
8/11/2008 Call from Mark Long.	25.00
Revising discovery.	350.00
letter to Klotz/Boston.	25.00
8/22/2008 Calls to clients concerning settlement offer.	312.50
Drafting settlement spreadsheet.	62.50
8/21/2008 Research settlement.	50.00
8/25/2008 Call from Mark Long.	25.00
8/26/2008 Drafting demand letter.	312.50
8/27/2008 Review and revise demand letter.	112.50
Conference with John, Matt concerning valuation of settlement.	60.00
8/29/2008 Phone conference with K. Harmon concerning expert report and email list.	90.00
Work on Judicial Settlement Conference.	90.00

	<u>Amount</u>
9/5/2008 Phone conference with R. White, M. Long, J. Toungett, C. Wade, C. Birdyshaw, S. Bates, and W. Fisher concerning past and present medications.	76.00
Compile spreadsheet of medications, indications, and side effects.	266.00
9/2/2008 Work on Judicial Settlement Conference letter.	450.00
9/3/2008 Work on Judicial Settlement Conference letter.	450.00
9/4/2008 Conference with J. Griffin concerning settlement statement.	225.00
9/5/2008 Research related to issues.	900.00
Attend Judge Griffin Pre-Settlement Conference.	157.50
Phone conference with B. Boston concerning damages chart.	45.00
Spreadsheet of damages.	150.00
Research cases concerning ADA and drug test.	125.00
Conference call with Judge Griffin.	62.50
9/4/2008 Call from Mark Long.	25.00
9/3/2008 Research cases concerning	250.00
8/29/2008 Letter to clients.	25.00
8/28/2008 Call from Carolyn Wade.	37.50
Revise demand letter.	25.00
9/8/2008 Work on Judicial settlement Conference.	675.00
Correspondence to Attorney.	25.00
Research drug interactions and effects.	62.50
9/9/2008 Case Management Conference.	1,375.00
9/26/2008 Letter to expert.	67.50
Call from Mark Long.	25.00
Motion to Extend Expert Disclosure Deadline.	125.00
9/25/2008 Conference with [REDACTED] concerning expert testimony.	450.00
9/26/2008 Letter to clients for info.	45.00

	<u>Amount</u>
10/3/2008 Phone conference with with Richard White.	25.00
Prepare documents for analysis by [REDACTED]	50.00
9/29/2008 Motion to Enlarge Case Management Order.	125.00
Prepare Motion to Enlarge Case Management Order.	125.00
10/3/2008 Work on memo.	90.00
9/30/2008 Prepare Motion to Enlarge Case Management Order.	437.50
10/16/2008 Work on Statement of Facts.	67.50
10/22/2008 Phone conference with [REDACTED] concerning data.	112.50
10/23/2008 Prepare for meeting with expert.	112.50
10/20/2008 Work on Statement of Facts.	135.00
10/21/2008 Phone conference with Sue Bates.	25.00
10/24/2008 Correspondence to Sue Bates concerning contacting individuals on leave from Dura.	25.00
11/4/2008 Letters requesting depositions. Prepare notice for corporation rep.	90.00
11/5/2008 Prepare notice of Rule 30. Review and revise letter.	135.00
10/31/2008 Prepare spreadsheet concerning employee information and data.	62.50
11/3/2008 Review notes from S. Bates concerning subsequent employment actions. Compile employee data concerning employment actions by Dura.	137.50
11/14/2008 Phone conference with S. Bates.	25.00
11/17/2008 Phone conference with R. White concerning status of case.	25.00
11/21/2008 Conference with B. Boston concerning discovery.	157.50
Conference with B. Boston concerning discovery.	157.50
11/20/2008 Phone conference with B. Briggs concerning date for telephone conference with Judge Trauger.	25.00
Correspondence with opposing counsel concerning telephone conference.	25.00
Review materials sent by C. Birdyshaw.	25.00
11/21/2008 Phone conference with B. Briggs concerning availability of Judge Trauger.	25.00

	<u>Amount</u>
11/21/2008 Correspondence with Boston.	25.00
Phone conference with B. Boston concerning discovery dispute.	25.00
11/25/2008 Phone conference with Judge Trauger concerning discovery dispute.	25.00
12/3/2008 Prepare Notice of Deposition.	45.00
11/25/2008 Case Management Conference.	112.50
12/9/2008 Prepare for deposition.	922.50
Prepare for depositions of L. Boots and M. Gent.	837.50
12/10/2008 Depositions of L. Boots and M. Gents.	1,062.50
12/4/2008 Finalize Notices of Deposition of M. Gents and L. Boots.	37.50
Correspondence with B. Boston concerning depositions.	25.00
12/5/2008 Correspondence to T. Smith.	25.00
12/8/2008 Phone conference with R. White.	25.00
Review discovery submitted by Dura; Prepare for L. Boots and M. Gents deposition.	812.50
Phone conference with M. Long.	25.00
12/10/2008 Attend depositions of L. Boots and M. Gent.	1,912.50
12/11/2008 Phone conference with Andy Naylor concerning depositions of Plaintiffs.	25.00
12/15/2008 Phone conference with Jon Toungett.	25.00
12/19/2008 Correspondence to A. Naylor concerning deposition dates.	25.00
12/22/2008 Phone conference with A. Naylor.	25.00
Correspondence to A. Naylor.	25.00
12/23/2008 Correspondence to A. Naylor concerning depositions.	25.00
Phone conference with C. Wade.	25.00
12/24/2008 Phone conference with C. Wade.	25.00
Phone conference with S. Bates.	25.00
Correspondence to A. Naylor.	25.00



	<u>Amount</u>
12/24/2008 Correspondence to all clients concerning deposition dates.	37.50
12/29/2008 Review and finalize employee data for expert analysis.	25.00
1/5/2009 Phone conference with Carolyn Wade concerning medical records needed and depo of eye doctor.	60.00
12/31/2008 Deposition of Carolyn Wade.	450.00
Letter to clients concerning Subpoenas.	25.00
Review Subpoenas sent by Dura.	25.00
1/5/2009 Deposition of C. Birdyshaw.	612.50
Phone conference with M. Long.	37.50
Phone conference with S. Bates.	25.00
1/6/2009 Deposition of M. Long.	587.50
Phone conference with R. White.	50.00
Phone conference with J. Toungett.	50.00
Phone conference with M. Long.	37.50
1/7/2009 Phone conference with R. White.	25.00
Deposition of R. White.	575.00
Phone conference with W. Fisher.	50.00
1/8/2009 Deposition of J. Toungett.	437.50
Prepare Subpoena to M. Peden and L. Peden.	75.00
Prepare Subpoena to S. Portnoy.	75.00
Phone conference with M. Barnes concerning serving Subpoena.	25.00
Correspondence to B. Boston concerning Notices of Deposition of M. Peden and L. Peden.	25.00
Phone conference with Premier Investigations concerning service of process on S. Portnoy.	25.00
Correspondence to M. Peden.	25.00
Correspondence to M. Barnes.	25.00
Correspondence to S. Portnoy.	25.00

	<u>Amount</u>
1/8/2009 Correspondence to Premier Investigation.	25.00
1/15/2009 Phone calls to arrange deposition of C. Wade's eye doctor.	45.00
1/12/2009 Deposition of S. Bates.	437.50
Deposition of W. Fisher.	375.00
1/13/2009 Correspondence to C. Birdyshaw.	25.00
Correspondence to J. Toungett.	25.00
Correspondence to C. Wade.	25.00
1/14/2009 Correspondence with A. Naylor concerning deposition.	25.00
Correspondence to B. Boston concerning Scheduling Order.	25.00
1/16/2009 Research case law concerning judicial estoppel and bankruptcy Petition.	537.50
Correspondence to R. Harlan concerning bankruptcy of M. Long.	25.00
1/19/2009 Prepare for L. Peden and M. Peden deposition.	525.00
1/20/2009 Deposition of L. Peden.	750.00
Deposition of M. Peden.	62.50
Correspondence with P. Walker concerning Scheduling Order.	25.00
Correspondence with P. Walker concerning withdrawing unsigned Scheduling Order.	25.00
1/21/2009 Prepare Response to Motion to Dismiss M. Long and Affidavit of M. Long.	487.50
Phone conference with M. Long concerning Affidavit.	25.00
Phone conference with Dr. Seth Portnoy.	25.00
Phone conference with A. Portnoy.	25.00
1/20/2009 Review Freedom From Self records.	337.50
Emails with opposing counsel concerning scheduling depo of Dr. Kostamaa.	45.00
Phone conference with Dr. Kostamaa's deposition.	30.00
1/16/2009 Communications with opposing counsel concerning scheduling depo of Dr. Kastamaa.	30.00
1/23/2009 Prepare depo summary for M. Jent.	270.00

	<u>Amount</u>
1/23/2009 Begin depo summary for L. Boots.	135.00
1/21/2009 Email with opposing counsel concerning finalizing Dr. Kostamaa's deposition, phone call to court reporter, and doctor's office.	45.00
Notice of Depo of Dr. Kostamaa.	30.00
Review and revise brief in opposition to to dismiss M. Long.	45.00
1/22/2009 Preparation for deposition of Dr. Kostamaa.	120.00
1/23/2009 Deposition of Dr. Kostamaa.	600.00
1/22/2009 Correspondence to P. Walker.	25.00
Finalize Response to Motion to Dismiss M. Long.	587.50
1/27/2009 Phone conference with P. Gifford concerning hiring for deposition.	50.00
Phone conference with Dr. Seth Portnoy concerning deposition.	25.00
Correspondence to P. Gifford.	25.00
Prepare S. Portnoy Subpoena.	50.00
Correspondence to S. Portnoy.	25.00
Correspondence to B. Boston and other Dura attorneys.	25.00
1/28/2009 Prepare questions and documents for S. Portnoy deposition.	487.50
1/29/2009 Prepare for deposition of Dr. Seth Portnoy. Prepare questions, Exhibits and fees.	387.50
Correspondence to A. Naylor.	25.00
1/30/2009 Phone conference with P. Gifford.	25.00
Phone conference with S. Portnoy.	25.00
Prepare for deposition of S. Portnoy.	250.00
2/2/2009 Phone conference with S. Portnoy	25.00
Phone conference with P. Gifford.	25.00
Review Subpoena documents from S. Portnoy. Revise deposition questions.	350.00
Phone conference with A. Naylor.	25.00
Phone conference with Judge Brown concerning mediation efforts.	62.50

	<u>Amount</u>
2/3/2009 Phone conference with P. Gifford.	25.00
Phone conference with P. Gifford.	25.00
Begin Response to Motion to Dismiss C. Birdyshaw.	362.50
2/5/2009 Prepare Response to Motion to Dismiss C. Birdyshaw.	287.50
2/6/2009 Prepare Affidavit of C. Birdyshaw.	37.50
2nd Request for Production of Documents.	50.00
Correspondence to B. Boston.	25.00
Finalize and file Response to Motion to Dismiss C. Birdyshaw.	225.00
2/12/2009 Phone conference with M. Long.	25.00
2/16/2009 Begin Motion for Summary Judgment.	90.00
2/23/2009 Review and revise beginning of brief.	90.00
2/24/2009 Phone conference with M. Long.	25.00
Phone conference with M. Long.	25.00
Begin researching caselaw for Motion for Summary Judgment.	362.50
2/25/2009 Prepare documents for deposition summaries.	125.00
2/26/2009 Prepare deposition summary for C. Wade.	370.50
Correspondence to Boss Reporting concerning Portnoy deposition transcript.	25.00
Begin Motion for Summary Judgment.	250.00
2/27/2009 Prepare summary of S. Bates deposition	370.50
Prepare summary of deposition of C. Birdyshaw	370.50
3/2/2009 Prepare deposition summary of W. Fisher.	370.50
Prepare deposition summary of M. Long.	370.50
Prepare summary of deposition of J. Toungett.	370.50
Identify supporting documents for Motion for Summary Judgment.	389.50
Finalize summary of deposition of L. Boots.	275.50

	<u>Amount</u>
3/5/2009 Finalize identifying and assembling supporting documents for Motion for Summary Judgment.	522.50
3/3/2009 Begin L. Boots depo summary.	225.00
3/4/2009 Depo summary of L. Boots.	630.00
3/5/2009 Work on Motion for Summary Judgment.	562.50
3/6/2009 Work on memo.	1,575.00
3/13/2009 Read Dura's Motion for Summary Judgment and outline response.	225.00
3/12/2009 Review Plaintiff medical records at Waller Lansden.	525.00
3/13/2009 Retrieve and review cases cited by Dura in Motion for Summary Judgment.	637.50
2/27/2009 Prepare Motion for Summary Judgment.	662.50
3/2/2009 Phone conference with Sherril at R. Harlan's office.	25.00
Correspondence to Sherrill at R. Harlan's office.	25.00
Begin Motion for Summary Judgment.	487.50
Review deposition of L. Peden.	212.50
3/3/2009 Prepare L. Peden Deposition Summary.	425.00
Deposition Summary of Dr. Seth Portnoy.	275.00
3/4/2009 Prepare motion for Summary Judgment.	775.00
3/5/2009 Prepare Motion for Summary Judgment.	1,712.50
3/6/2009 Finalize Motion for Summary Judgment.	1,587.50
3/9/2009 Review Dura's Motion to Dismiss.	62.50
3/18/2009 Summarize case.	180.00
3/19/2009 Work on Response to Statement of Undisputed Facts.	292.50
3/20/2009 Work on Response to Statement of Undisputed Facts.	630.00
3/16/2009 Work on review of cases cited by Dura in Motion for Summary Judgment.	540.00
3/23/2009 Review deposition of Mark Long and prepare summary.	332.50
3/17/2009 Begin Response to Dura's Statement of Undisputed Facts.	362.50

	<u>Amount</u>
3/18/2009 Prepare summaries of cases cited by Dura.	650.00
3/19/2009 Correspondence to R. Harlan.	25.00
Prepare Notice of Filing of letter from attorney Robert Harlan.	50.00
3/24/2009 Work on brief.	540.00
Work on response to Statement of Facts.	900.00
3/25/2009 Work on equitable tolling agreement. Revise Response to Statement of Undisputed Facts.	1,125.00
Review and revise brief.	450.00
3/26/2009 Assemble Exhibits for Response to Statement of Facts and Motion for Summary Judgment.	152.00
Review and revise brief, Statement of Undisputed Facts, write conclusion, write on direct evidence, and review.	1,350.00
3/23/2009 Begin Response to Motion for Summary Judgment.	400.00
3/24/2009 Prepare Response to Motion for Summary Judgment.	787.50
3/25/2009 Prepare Response to Motion for Summary Judgment.	962.50
3/26/2009 Finalize Response to Motion for Summary Judgment.	1,162.50
3/21/2009 Work on response to statement of undisputed facts and brief.	675.00
3/30/2009 Phone conference with R. White.	25.00
3/31/2009 Finalize and file 2nd Joint Mediation Report.	25.00
3/30/2009 Review brief filed by Defendant.	225.00
4/6/2009 Work on reply brief.	450.00
4/8/2009 Assemble exhibits for Reply to Response to Motion for Summary Judgment.	38.00
4/7/2009 Work on brief.	270.00
4/3/2009 Begin Reply to Response to Plaintiff's Motion for Summary Judgment.	175.00
4/7/2009 Begin Reply to Response to Motion for Summary Judgment.	300.00
4/8/2009 Prepare Reply to Response to Motion for Summary Judgment.	775.00
4/9/2009 Finalize Reply to Response to Motion for Summary Judgment.	387.50
Correspondence to R. Harlan.	25.00

	<u>Amount</u>
4/21/2009 Phone conference with R. White.	25.00
4/23/2009 Review Judge Trauger's order concerning Summary Judgment Motions.	37.50
4/8/2009 Continue working on brief.	337.50
5/4/2009 Correspondence to S. Bates.	25.00
Correspondence to C. Birdyshaw.	25.00
Correspondence to J. Toungett.	25.00
Correspondence to W. Fisher.	25.00
Correspondence to M. Long.	25.00
Correspondence to R. White.	25.00
Correspondence to C. Wade.	25.00
5/7/2009 Work on L. Boots cross examination.	315.00
5/20/2009 Complete first draft of cross exam of L. Boots.	157.50
5/22/2009 Work on Pre-trial Order.	405.00
5/26/2009 Prepare draft of initial Pre-trial Order.	202.50
6/3/2009 Work on cross exam of M. Jent.	562.50
6/4/2009 Work on L. Peden cross exam.	292.50
5/28/2009 Phone conference with R. White.	25.00
6/11/2009 Begin assembling exhibits for cross examination of Jent..	76.00
Begin assembling exhibits for cross examination of Boots.	95.00
Begin assembling exhibits for cross examination of Peden.	95.00
6/15/2009 Complete Exhibit List for cross examination of L. Peden.	190.00
6/9/2009 Work on L. Peden cross-exam.	337.50
6/10/2009 Prepare Dr. Portnoy concerning deposition.	180.00
6/11/2009 Work on Pre-trial Order.	112.50
6/18/2009 Prepare Jury Charges and Jury Instructions.	412.50

	<u>Amount</u>
7/8/2009 Prepare Jury Verdict Forms.	175.00
7/17/2009 Work on opening statement, witness list, and direct exam.	225.00
7/14/2009 Phone conference with M. Long.	25.00
Correspondence to clients.	25.00
Finalize Pre-Trial Order.	262.50
Phone conference with J. Toungett.	25.00
7/15/2009 Prepare stipulations of fact.	537.50
7/17/2009 Finalize proposed stipulations.	87.50
7/20/2009 Letter to clients concerning witness list.	45.00
7/21/2009 Work on opening statement.	180.00
Begin response to motion.	90.00
7/23/2009 Finalizing portion of brief concerning procedural irregularities in Motion to Clarify-Response.	30.00
7/22/2009 Research and drafted brief concerning no procedure for Motion for Clarification-Response.	450.00
7/21/2009 Review Pre-Trial Order.	225.00
7/22/2009 Begin Response to Motion to Clarify.	125.00
7/23/2009 Prepare response to Motion to Clarify.	312.50
7/24/2009 Finalize Response to Motion to Clarify.	62.50
Correspondence to B. Boston concerning stipulations.	25.00
7/23/2009 Review and revise response to Motion to Clarify.	180.00
Work on Opening Statement.	90.00
7/24/2009 Work on Opening Statement.	225.00
Review and revise stipulations.	180.00
7/21/2009 Review and analysis of Dura's Motion for Clarification.	90.00
7/27/2009 Continue working on Opening Statement.	225.00
7/29/2009 Review Judge's Order concerning Interlocutory Appeal.	45.00



	<u>Amount</u>
8/5/2009 Letter to clients concerning appeal and case status.	45.00
8/4/2009 Review Memorandum Order.	67.50
8/7/2009 Correspondence to L. Boots concerning Subpoena.	25.00
8/12/2009 Phone conference with W. Fisher.	37.50
9/1/2009 Phone conference with Sixth Circuit Court Clerk.	25.00
Research Sixth Circuit Court of Appeals Rules on preparing the record.	25.00
9/9/2009 Review Reply to Response to Motion for Summary Judgment.	37.50
9/16/2009 Phone conference with B. Boston concerning status of case.	67.50
9/17/2009 Phone conference with C. Birdyshaw.	37.50
Phone conference with R. White.	25.00
Review EEOC Complaint against Dura.	137.50
10/13/2009 Phone conference with counsel for EEOC.	45.00
10/14/2009 Phone conference with EEOC lawyer concerning case.	90.00
10/22/2009 Phone conference with 6th Circuit Court Clerk concerning status of appeal.	25.00
9/30/2009 Phone conference with C. Birdyshaw.	25.00
11/12/2009 Download and prepare required documents for 6th Circuit Court of Appeals.	28.50
11/20/2009 Review Court of Appeal filings by Dura Auto.	50.00
12/8/2009 Prepare Mediation Statement.	225.00
12/10/2009 Mediation with 6th Circuit.	450.00
12/24/2009 Begin review of cases.	90.00
12/14/2009 Research GM v. Wice case.	37.50
12/15/2009 Research Wice v. GM court opinion and briefs.	25.00
12/7/2009 Interoffice conference with J. Beam concerning appellate brief.	25.00
12/23/2009 Review Appellate Brief of Dura.	62.50
12/28/2009 Begin Appellate Brief.	812.50

	<u>Amount</u>
12/29/2009 Prepare Appellee Brief.	937.50
12/30/2009 Prepare Appellee Brief.	375.00
12/29/2009 Research for response brief in 6th circuit.	225.00
1/19/2010 Review and revise Appellant Brief and file.	675.00
1/26/2010 Phone conference with clerk concerning need to re-file Notice of Appearance forms.	30.00
Fixing software and re-filing Notice of Appearance forms.	150.00
1/19/2010 Made corrections to and proofread brief, filed brief online.	264.00
1/26/2010 Filed Notice of Appearance.	12.00
1/13/2010 Notice of Appearance Forms & Corporate Disclosure Statements.	75.00
1/22/2010 Filed in 6th Circuit Court.	15.00
8/25/2010 Prepare and file Oral Argument with Court of Appeals.	13.50
9/28/2010 Work on preparing the facts.	90.00
10/14/2010 Prepare for argument at Sixth Circuit.	675.00
10/15/2010 Work on appeal argument.	1,012.50
10/12/2010 Work on preparation for Sixth Circuit argument.	450.00
11/3/2010 Begin Motion and Memo to Reconsider issue of improper medical inquiry.	45.00
11/4/2010 Began Motion to Reconsider.	337.50
11/5/2010 Letter to all clients.	45.00
File Memo and Motion.	45.00
11/3/2010 Work on Motion to Reconsider.	67.50
12/15/2010 Letter to clients concerning Memorandum allowing Plaintiffs to proceed to trial.	13.00
12/14/2010 Prepare reply brief.	787.50
1/13/2011 Court to schedule case.	225.00
2/10/2011 Complete Memorandum to Motion for Summary Judgment and prepare Motion for Summary Judgment.	13.50
Assemble exhibits for Memorandum to Motion for Summary Judgment.	58.50

	<u>Amount</u>
2/11/2011 Finalize and file Motion for Summary Judgment and Memorandum, together with related exhibits.	27.00
2/21/2011 Found and printed cases.	96.00
2/8/2011 Work on Motion for Summary Judgment.	157.50
2/9/2011 Work on Motion for Summary Judgment.	337.50
2/10/2011 Work on Motion for Summary Judgment.	1,125.00
2/11/2011 Review and revise brief and file.	225.00
Letter to claimants.	45.00
2/28/2011 Work on brief.	337.50
3/1/2011 Work on brief.	1,462.50
3/11/2011 Begin assembling exhibits for Response to Dura's Second Motion for Summary Judgment.	90.00
3/14/2011 Finalize assembly of exhibits for Statement of Facts and Response to Motion for Summary Judgment.	180.00
3/4/2011 Work on brief.	697.50
3/7/2011 Work on brief.	450.00
3/14/2011 Final review and file Memorandum of Law.	1,012.50
3/15/2011 Work on response brief.	787.50
3/9/2011 Work on response brief.	787.50
3/10/2011 Work on brief.	1,575.00
3/11/2011 Work on Response to Statement of Undisputed facts.	1,125.00
3/15/2011 Retrieved cases from memo in Opposition to Motion for Summary Judgment.	60.00
3/22/2011 Work on brief.	720.00
3/23/2011 Work on brief.	382.50
Work on brief and work on response to Statement of Undisputed Facts.	450.00
3/18/2011 Review Defendant case law.	112.50
5/16/2011 Begin Jury Instructions.	292.50

	<u>Amount</u>
6/14/2011 Begin assembling plaintiff's exhibits for trial.	237.50
6/6/2011 Begin Motion to Quash Deposition.	225.00
6/7/2011 Begin Response to Brief. Begin direct exam preparation.	157.50
Work on response to brief.	157.50
6/8/2011 Prepare Motion to Quash and Brief.	562.50
6/10/2011 Attend Motion hearing and prepare.	225.00
6/17/2011 File two Motions in Limine with Memorandums.	28.50
6/14/2011 Begin Motions in Limine.	67.50
Begin Witness and Exhibit List.	90.00
Work on stipulations and email to A. Naylor.	112.50
6/10/2011 Work on M. Jent cross examination.	337.50
6/16/2011 Review Motions in Limine.	90.00
6/17/2011 Review and revise Motions in Limine and file.	337.50
6/21/2011 Assemble and trial exhibits and witness list. Begin trial notebook.	225.00
6/23/2011 Finalize trial exhibits and trial notebook.	135.00
Work on direct exams.	1,462.50
6/24/2011 Work on direct exams.	1,350.00
6/20/2011 Work on cross exams.	112.50
Work on Exhibit Lists.	450.00
6/21/2011 Work on witness testimony.	1,350.00
6/22/2011 Work on testimony.	157.50
6/27/2011 Work on direct exams.	1,125.00
6/28/2011 Review Motions in Limine and cases. Begin responses to Motions in Limine.	1,575.00
6/7/2011 Began Plaintiffs Response to Motion for Deposition.	17.50
6/14/2011 Began Witness & Exhibit List.	17.50

	<u>Amount</u>
6/14/2011 Began Motion in Limine concerning excluding expert analysis.	17.50
6/23/2011 Revised Direct Exam of Richard White.	70.00
Revised Direct Exam of Sue Bates.	70.00
6/24/2011 Revised Direct Exam of Mark Long.	70.00
Revised Direct Exam of Carolyn Wade.	70.00
6/27/2011 Revised Direct Exam of Willarene Fisher.	52.50
6/30/2011 File Responses to Motions in Limine.	58.50
Assemble Motions in Limine, Memorandums, and Responses for trial notebook.	108.00
6/29/2011 Response to Economic Bias Motions in Limine, Response to Allowing Jury View, Response to Excluding other Lawsuits.	193.50
Continued work on Motions in Limine.	180.00
6/28/2011 Responses to Motions in Limine.	184.50
Continued Responses to Motions in Limine and correspondence to C. Birdyshaw and R. White concerning depositions.	180.00
Phone conference with M. Long.	63.00
Phone conference with R. White.	54.00
Prepared Motions in Limine.	45.00
Worked on Motions in Limine.	189.00
6/16/2011 Prepared Memos in Support of Motions in Limine concerning expert testimony.	90.00
6/15/2011 Drafting Motions in Limine to Exclude Expert Testimony of Patsy, Nancy, and Donna - not identified as experts.	157.50
Continued drafting Motions in Limine to Exclude Expert Testimony of Patsy, Nancy, and Donna.	166.50
6/13/2011 Phone conference with C. Wade concerning testimony.	27.00
Continued research on Counterclaims and Answers Memo.	207.00
6/6/2011 Researched Response to Expedited Motion.	9.00
6/7/2011 Research on opponent cases and Memo to Quash/Limit Deposition.	157.50
Continued research on opponent cases and Memo to Quash/Limit Deposition.	189.00

	<u>Amount</u>
6/8/2011 Summarizing cases for Memo Response to Motion to Allow Portnoy's Second Deposition.	180.00
Phone conference with all clients going over Statement of Facts and testimony.	180.00
6/9/2011 Response to Request for Portnoy's Deposition and Memo. Phone conference with J. Toungett and S. Bates concerning testimony.	171.00
Phone conference with C. Wade and R. White discussing testimony and reminding them of trial.	81.00
6/10/2011 Phone conference with Judge concerning Status Conference.	9.00
7/5/2011 Prepare Motions in Limine trial notebook.	49.50
7/7/2011 Letter to A. Naylor concerning subpoenas.	9.00
Complete Trial Notebook and Motion Notebook.	58.50
7/11/2011 Finalize Trial notebooks and documents for trial.	67.50
7/5/2011 Prepared and sent Subpoenas.	168.00
7/8/2011 Filed Jury Instructions, planned and called claimants.	108.00
6/29/2011 Work on Rule 26 Supplement and responses to Motions in Limine.	1,800.00
6/30/2011 Work on Direct Exams. Complete response to Motions in Limine.,	1,350.00
7/1/2011 Work on exhibits, claims, Pretrial Order, etc.	1,575.00
7/5/2011 Testimony of witnesses.	450.00
Work on issue for trial.	630.00
Work on brief in response to Motion to Dismiss. Work on jury instructions.	1,125.00
7/6/2011 Attend Pretrial Conference.	337.50
Work on trial issues.	1,125.00
Work on jury instruction.	67.50
7/8/2011 Work on jury questions and voire dire and related items.	2,475.00
7/9/2011 Work on witness interviews and testimony.	2,700.00
7/10/2011 Prepare for trial.	1,800.00
7/8/2011 Calling Plaintiffs, jury instructions, finishing putting exhibits in direct exams.	171.00

	<u>Amount</u>
7/8/2011 Making notations as to which exhibits of Defendant are the same as Plaintiff.	189.00
7/7/2011 Incorporating exhibits into direct exams and phone calls to Plaintiffs.	157.50
Incorporating exhibits into direct exams.	207.00
7/6/2011 Phone conference with C. Wade and working on direct exams.	49.50
Working on cross exam of Patsy Bramlett.	112.50
Phone conference with C. Wade concerning cross exam.	162.00
7/5/2011 Calculating damages, calling Plaintiffs, working on direct exams.	175.50
Continued phone calls to Plaintiffs.	184.50
7/1/2011 Working on direct exams for C. Wade and W. Fisher.	180.00
Copying exhibits and working on direct exams.	157.50
6/30/2011 Phone call with J. Toungett and S. Bates.	162.00
Direct Exams for W. Fisher and C. Wade, revising direct exams, mailed depositions.	211.50
7/7/2011 Review video.	225.00
7/12/2011 Prepare for opening and attend trial.	2,250.00
7/11/2011 Prepare for trial.	1,350.00
7/13/2011 Prepare for witness exams and attend trial.	2,250.00
7/14/2011 Prepare for cross exams and attend trial.	2,475.00
7/15/2011 Prepare for cross exams and attend trial.	1,800.00
7/16/2011 Prepare for closing argument and summarization of case.	2,250.00
7/18/2011 Prepare and deliver closing argument and wait on jury to deliberate.	3,487.50
7/19/2011 Attend last day of trial for verdict.	1,575.00
7/21/2011 Research on standard for awarding back pay, whether mandatory or permissive.	103.50
Research on mandatory back pay awards continued.	184.50
7/11/2011 Research on admissibility of doctors letters. Phone calls to Plaintiffs.	189.00
Exhibit Charts for trial. Phone calls to Plaintiffs.	202.50

	<u>Amount</u>
7/13/2011 Attend Trial.	216.00
Attend trial.	234.00
7/12/2011 Attend trial.	211.50
Attend Trial.	270.00
7/19/2011 Attend Trial.	337.50
7/18/2011 Attend trial.	207.00
Attend trial.	360.00
7/15/2011 Attend Trial.	414.00
7/14/2011 Attend Trial.	211.50
Attend trial.	220.50
7/1/2011 Correspondence to all Plaintiffs concerning exhibits for trial.	21.00
7/8/2011 Began preparing Jury Instructions for each Plaintiff.	35.00
Correspondence to all Plaintiffs concerning Jury Verdict Form.	17.50
For professional services rendered	<u>\$148,793.50</u>
Additional Charges :	
June copies.	32.40
June postage.	13.58
July copies.	27.80
July postage.	3.69
August Copies.	1.20
August Postage.	0.58
Parking.	4.60
Sept. copies.	8.20
Sept. postage.	10.42
Sept. faxes.	2.00
Copies.	3.00
Postage.	1.64
Copies	1.80
Postage.	1.23
Copies	1.20
Postage	0.82
Copies.	0.40
Postage.	0.41
Copies	3.00
Postage	0.41



	<u>Amount</u>
Copies.	0.20
Postage.	0.58
Postage.	0.58
US District Court filing fee.	350.00
Copies	59.40
Postage.	11.55
Faxes	1.00
Copies.	8.80
Postage.	7.17
July copies.	17.80
July postage.	6.96
August copies.	0.40
August postage.	4.20
September copies.	11.60
September postage.	9.09
October copies.	14.80
October postage.	6.48
November copies.	0.80
November postage.	0.42
November FAX.	36.00
December copies.	236.40
December postage.	5.47
December FAX.	6.00
January postage.	12.96
January copies.	284.00
January FAX.	20.00
Court Reporter fee.	1,579.00
Court reporter fee.	591.75
Court reporter fee.	188.75
Court reporter fee.	294.50
Court reporter fee.	284.25
Court reporter fee.	313.25
Court reporter fee.	315.75
M. Peden depositio fee.	90.00
L. Peden deposition fee.	90.00
M. Barnes deposition fee.	55.00
L. Peden deposition fee.	55.00
M. Peden deposition fee.	55.00
Dr. Partnoy deposition fee.	1,000.00
P. Gifford, Esq. legal fee.	1,000.00
February copies.	60.40
February postage.	2.95
FedEx fee.	55.51
Dr. Kostama's fee.	500.00
Court reporter fee.	1,294.00
Court reporter fee.	609.74
FedEx fee.	39.39
March copies.	49.80
Parking.	12.00
Attorney fee for Florida deposition.	218.75
Waller Landsden copy fee.	46.60

	<u>Amount</u>
Mileage	66.00
April copies.	0.40
April postage.	0.42
May copies.	56.80
May postage.	11.76
Court reporter fee.	100.00
Court reporter fee.	140.00
Witness fee - Lindy Boots.	117.00
July copies.	10.80
July postage.	8.54
Process service fee.	85.00
August copies.	21.60
August postage.	5.90
August postage.	3.08
August copies.	1.40
October copies.	3.00
October postage.	3.08
November postage.	4.27
November copies.	11.40
December copies.	22.40
December postage.	7.35
January copies.	3.00
January postage.	3.08
February postage.	13.30
February copies.	39.80
June copies.	156.80
 June postage.	 21.61

Total additional charges	<u>\$10,950.22</u>
Total amount of this bill	<u>\$159,743.72</u>
Balance due	<u>\$159,743.72</u>

**Make check payable to Equitus Law Alliance, PLLC**

THANK YOU FOR YOUR BUSINESS!